#### ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

#### VISUAL SITE INSPECTION SUMMARY

Clark Oil & Refining Corporation (Clark)
131st & Kedzie Avenue
Blue Island, IL

Date:

August 21, 1991

Facility Representatives:

Ronald Snook, Clark Oil & Refining Corporation Stafford Jacques, Clark Oil & Refining Corporation

Inspection Team:

Scott R. Tajak, Resource Applications, Inc. Cynthia Tarka, Resource Applications, Inc.

Photographer:

Scott R. Tajak

Weather Conditions:

Sunny, Temperature 85°F

Summary of Activities:

RAI conducted a VSI at the Clark facility at 8:30 A.M. on August 21, 1991. Mr. Ronald Snook and Stafford Jacques were present as facility representatives, and explained facility operations and waste management practices. The facility is an operating refinery which produces many petroleum based products. The size of the facility is 160 acres. A significant volume of oil was observed around the base of the Asphalt Tank (AOC 1), lying on bare earth. With this exception, RAI concluded that wastes at the Clark facility are well managed. RAI concluded the

VSI at 5:30 P.M.



Photograph No. 1

Orientation: East Date: 08/21/91
Description: Outdoor Drum Storage Area. The pallet in middle contains spent TCA and PCB-

contaminated oil waste. The barrels to the left and right contain asphalt product.



Photograph No. 2 Orientation: North Location: SWMU 2 Date: 08/21/91

Location: SWMU 1

Description: Sampled Product Waste Accumulation Areas in Refinery Process Area.



Photograph No. 3 Orientation: South

Description: Bundle Cleaning Pad located in Refinery Process Area.

Location: SWMU 4 Date: 08/21/91



Photograph No. 4 Orientation: Northeast

Description: Former Satellite Accumulation Area.

Location: SWMU 5 Date: 08/21/91



Photograph No. 5

Orientation: East

Description: Former Storage Area. Tank #801 is in background. The empty area in right hand

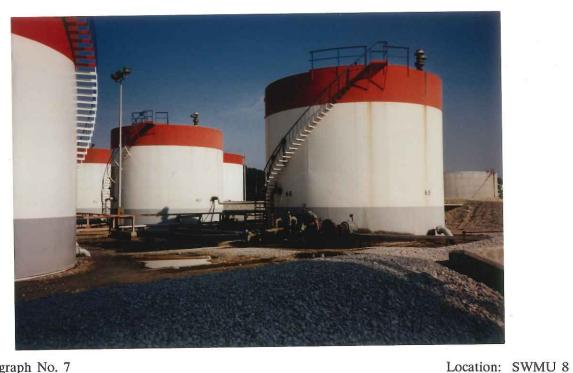
bottom corner is where unit was located.



Photograph No. 6 Orientation: South

Description: Satellite Accumulation Area for Scrap Sulfur.

Location: SWMU 7 Date: 08/21/91



Photograph No. 7 Orientation: Southeast

Date: 08/21/91 Description: Storage Treatment Tanks. Tanks #63 and #65 (center and right) are oil-water separator

units. Tank #66 (left) is a storage tank.



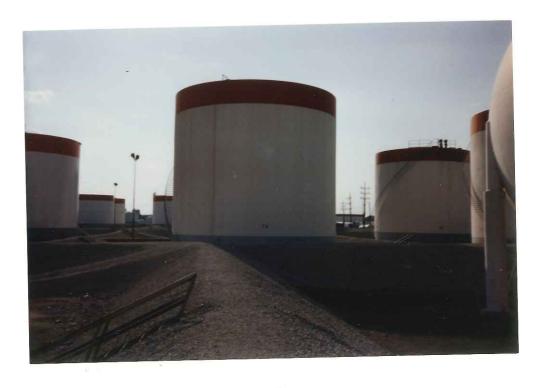
Photograph No. 8 Orientation: East

Location: SWMU 8 Date: 08/21/91 Description: Storage Treatment Tanks and pipeline connection to tanker truck waste disposal pumping

station. A full dip pan is in foreground. Note heavy soil staining in center.



Photograph No. 9 Location: SWMU 9 Orientation: North Date: 08/21/91 Description: Approximate location of Former Container Storage Treatment Area in foreground.



Photograph No. 10 Orientation: West

Location: SWMU 12 Date: 08/21/91

Description: Approximate location of Former Storage Treatment Tank. According to the RCRA Part

A Permit application map, this former unit was located where the dike is currently.



Photograph No. 11 Location: SWMU 13 Orientation: East Date: 08/21/91

Description: Approximate location of the Former Drum and Waste Storage Area, currently owned by

BTL Industries. The unit location lies on east side of fence.



Photograph No. 12 Orientation: Southwest

Date: 08/21/91 Description: Approximate location of a Former Container Storage Area. Currently, Clark

Corporation's Blue Island Terminal is situated on this former waste area.



Photograph No. 13 Orientation: West Location: SWMU 15 & 16

Date: 08/21/91

Description: Approximate locations of a Former Container Storage Area (SWMU 15) and the Former Waste Pile Area (SWMU 16). Note electrical connection for a former flare unit in bottom right-hand

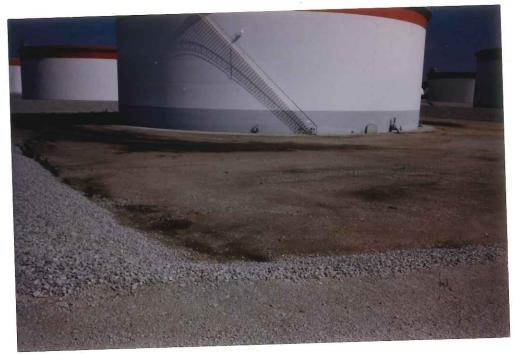
corner.



Photograph No. 14 Orientation: Southwest Location: SWMU 17 Date: 08/21/91

Description: Location of the Former Waste Piles and Impoundment Area. Note lack of vegetation in

center.



Photograph No. 15 Orientation: Southwest

Description: Former Impoundment Area.

Location: SWMU 18 Date: 08/21/91



Photograph No. 16 Orientation: East Location: SWMU 19 Date: 08/21/91

Description: An example of wastewater drain which leads into Wastewater Treatment System.



Photograph No. 17
Orientation: North
Location: SWMU 19
Date: 08/21/91

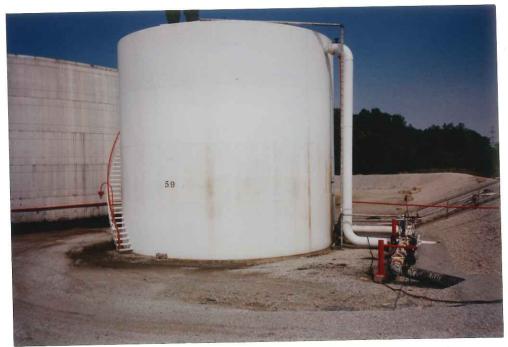
Description: An example of an oily waste pump for the Wastewater Treatment System.



Photograph No. 18
Orientation: West
Location: SWMU 19
Date: 08/21/91

Description: Some of the wastewater is neutralized in this alkylation neutralization permit. The

neutralized wastewater is pumped to the Wastewater Treatment System.

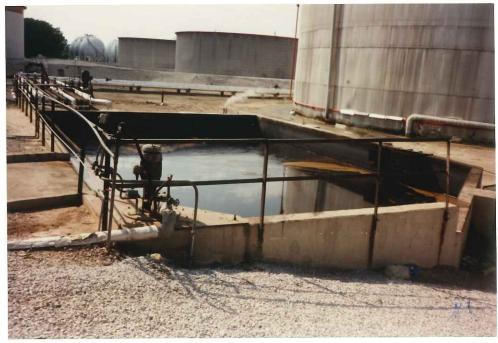


Photograph No. 19 Orientation: East Location: SWMU 19

Date: 08/21/91

Description: Treatment Tank #59 (center). This unit is an oil water separator. Note Tank #51 (left),

an Asphalt Tank (AOC 1) leaking oil at base on left side of photo.



Photograph No. 20 Orientation: Northwest Location: SWMU 19

Date: 08/21/91

Description: This 72,000-gallon overflow pit captures wastewater that Tank #59 cannot handle.



Photograph No. 21 Orientation: South

Description: An oil water skimmer, part of DAF oil water separator.

Location: SWMU 19 Date: 08/21/91

Date. 00/21/91



Photograph No. 22 Orientation: West

Description: Location of 2 API oil-water separators.

Location: SWMU 19 Date: 08/21/91



Photograph No. 23 Orientation: West Description: The DAF oil water separator unit.

Location: SWMU 19 Date: 08/21/91



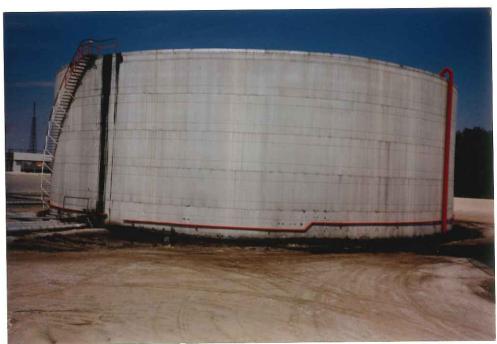
Photograph No. 24
Orientation: West
Location: SWMU 19
Date: 08/21/91

Description: Flow Meter location. Discharge point of clean water to MWRD Sewer System.



Photograph No. 25 Orientation: South Location: SWMU 22 Date: 08/21/91

Description: Cooling tower used by Water Treatment Plant for cooling boilers. Note sludge splattering on unit wall. Also note caustic on ground under sulfuric acid tank.



Photograph No. 26

Orientation: Northeast

Description: Asphalt Product Tank. Note oily liquid on soil at base of tank.

Location: AOC 1 Date: 08/21/91



Photograph No. 27 Orientation: East

Description: Location of two Underground Fuel Product Storage Tanks.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

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REPLY TO ATTENTION OF: 5HR-12

August 14, 1991

Mr. John Bernbom Clark Oil & Refining Corp. 131st & Kedzie Avenue P.O. Box 297 Blue Island, IL 60406

> Re: Visual Site Inspection Clark Oil & Refining Corp. ILD 005 109 822

Dear Mr. Bernbom:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for August 21, 1991. The inspection team will consist of Cindy Tarka and Scott Tajak of Resource Applications, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

Sheri L. Branch

√ Kevin M. Pierard, Chief ○ OH/MN Technical Enforcement Section

Enclosure

cc: Cliff Gould, IEPA - Maywood

#### ATTACHMENT

Clark Oil & Refining Corp. 131st & Kedzie Avenue Blue Island, IL 60406

#### PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of SWMUs at Clark Oil & Refining Corp. Please list all waste management units active or inactive at your facility. Please provide as complete information as possible for the waste units in response to the questions below.

## From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
- · What are the start-up and closure dates of the above SWMUs?
- What types of wastes are the SWMUs currently/formerly used for?
- Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.
- 2. Please supply as much information as possible concerning the site history. This would include any information you have regarding any other owner/operators at this location.
- 3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
- 4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

#### If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

**DATE:** 2/27/91

SUBJECT: Clark Oil- Blue Island, Site Visit and Fact Sheet

ILD 005 109 822

Re: Clark Oils Request for 30-day extension

FROM: Robert Fuhrer Falur Falur

TO: File

#### GENERAL

On February 11, 1991, Robert Fuhrer of the U.S. EPA, visited the Clark Oil, Blue Island facility. Mr. Tom Snook, Clark Oils Environmental Specialist discussed the site history, the issues of the request for a 30 day extension, and then gave a tour of the facility. This site visit summary will briefly review the site history, waste water treatment unit, and the extension issue.

When discussing this site and reviewing some of the files we found out that Mr. John Mahler of the IEPA Maywood office conducted his biennial site inspection last week. The only major violation was that a Safety-Kleen truck came in and took some hazardous waste material without manifesting or calling up Clark Gils environmental office, because he thought Clark was a small quantity generator. In 1989, Donna Check of the IEPA conducted a thorough inspection of the Clark Oil site.

When asked about the new Petroleum Refinery Sludge Rule (FR v.55, n.213, 11/2/90), Clark Oil said the only concerns were if they had any spills of gasoline product. I asked about the new TCLP rule and how it would effect this site and they said not unless there were benzene levels in their non-hazardous waste piles.

When touring the site we discovered that the flare area on site has been paved over in the past two (2) years and is now a part of the Clark Oil distribution system and has a independent manager.

We saw the booms that would be placed across the Cal-Sag Canal if there was a spill.

We also saw some caustic on the ground, by the caustic tanks in the refinery area.

#### HISTORY

Mr. Emery T. Clark started the Clark Oil and Refining Company in the early 1930's. In 1981, Clark Oil was sold to Apex Oil. Apex Oil sold Clark Oil in 1988 to the Horsham Company. The Horsham Company has worked to try and limit Clark Oils liability problems. Clark Oil's Blue Island facility began operations in September of 1945.

In 1985, the chemical portion of the Clark Oil site was sold to a company called BTL Resins. IEPA inspectors (Rich Finely and Tom Enno) seem to indicate that

there is "gross contamination" of the chemical portion of this part of the site with KO22, distillates, bottoms tars, cumene, and phenol contamination.

Currently Clark generates KO48-51, has 250 to 280 employees and is located in parts of Blue Island, Unincorporated Cook County, Worth Township and Alsip. The Blue Island facility produces about 70,000 barrels of petroleum product per year.

All sampling currently performed at the site is performed by EMT and Gabriel laboratories. An example of a EMT lab report taken at the flume exit to the MSDGC is attached. They are currently storing 3 roll off boxes of construction debris in the north west property which is waiting to be tested for raw benzene. If raw benzene was discovered they would then conduct a TCLP test. Six boxes were recently removed from this area following negative tests for benzene. I did not visit this area because it was said to have no roads and Clark Oil did not have an off road vehicle available.

#### WASTE WATER TREATMENT

Clark Oil generates API separator sludge (KO51), DAF float (KO49), and leaded tank bottoms (KO52). The wastes (except KO52) end up in the API separator, overflow pile which are the major components of their wastewater treatment system.

The waste water treatment area can be considered a SWMU. Tank 59 is where all the refinery influent water goes and is then sent to the oil water separator. From there it goes to two (2) API separators then to the DAF separator eventually entering the Municipal Sanitary District of Greater Chicago (MSDGC) sewer connection. The sludge is currently sent to Avganics in Terra Haute IN. A vacuum truck comes (supposedly) within 90 days to pick up the sludge. The overflow (oil slop) area is currently at a low level and has been frozen for the past 2 months. This area is concrete lined similar to a tank. There is a cone bottom tank that is used on a irregular schedule that seems to have contributed to some local contamination to the ground surface.

The slop oil "overflow" area directly north of the API and DAF separators was at a low level, but still takes oily waste from the refinery and the separators (see map).

Before this site visit, Clark Oil was allowed to bypass their DAF and API separators and directly place their waste in the MSDGC sewer while "upgrades" were performed on their waste water treatment plant (see map).

#### **EXTENSION ISSUE**

The reason for this site visit was to discuss the Clark Oil's requested extension of hazardous waste storage for 30 days. Clark wants this 30 day extension for storage of hazardous waste because they stored leaded tank bottoms (KO52) for over 90 days in 1981. An example of unleaded tank bottoms was displayed which consisting of a fine brown clayey soil. Clark Oil stated that they <u>deserve</u> a 30 day extension because they had no control over the storage beyond 90 days.

If Clark received a 30 day extension they would be able to apply to the IEPA for withdrawal. Clark Oil does not want to be a closed TSD, they want to be "off the books" so that their credit rating and liability does not suffer.

The KO52 material was placed into a lined roll-off box and after sampling it, it did not exhibit hazardous characteristics even though it was a listed waste.

The incidence of leaded tank bottoms occurred (as Clark states) as a one time event and cleaning of Tank #46 where 8 yards of the material was placed into a plastic lined roll-off box. This roll-off box was moved from the Tank 46 area in the South West property (sometime after sampling on 7/7/81) and moved to the "800 Tank Farm" specifically in the south west corner on the grounds of Tank 801 (see map).

Clark Oil said that no other tanks were "cleaned" because they never had any problems. This suggested that there was some problem with Tank #46, but no one knows for sure.

The issue arises that Clark Oil "accumulated" eight (8) yards of KO52 (leaded tank bottoms) longer than 90 days. This material was disposed of on 11/3/81 at CID. According to §262.34 (b) accumulation time can be decided at the discretion of the Administrator.

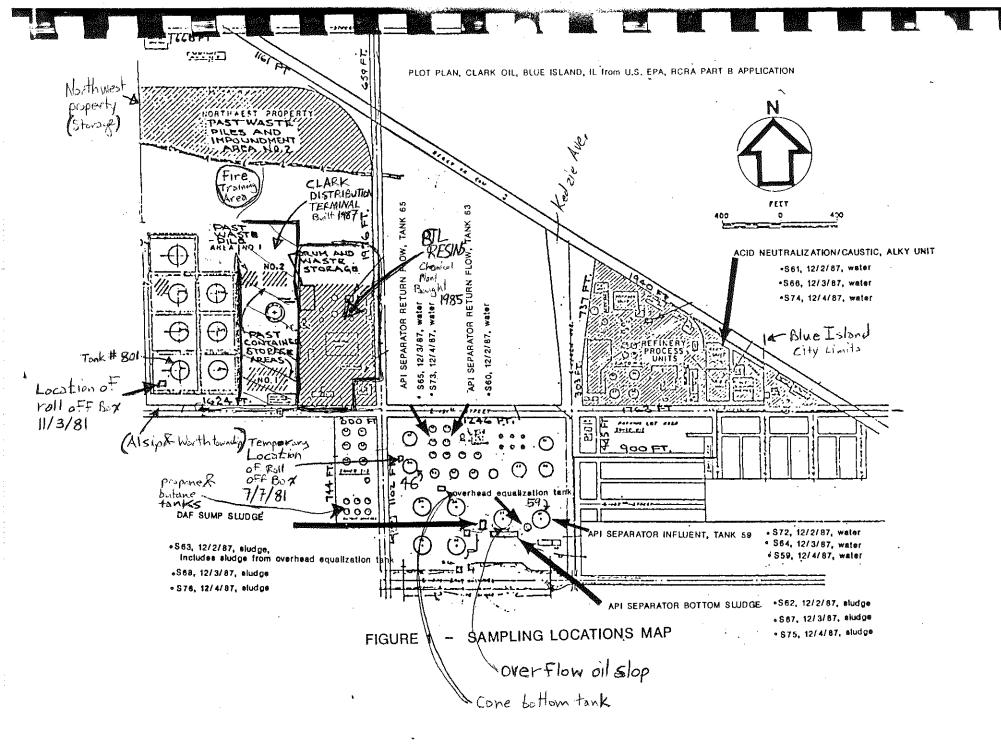
Clark Oil indicated that they would pursue this issue to the top of the chain of command.

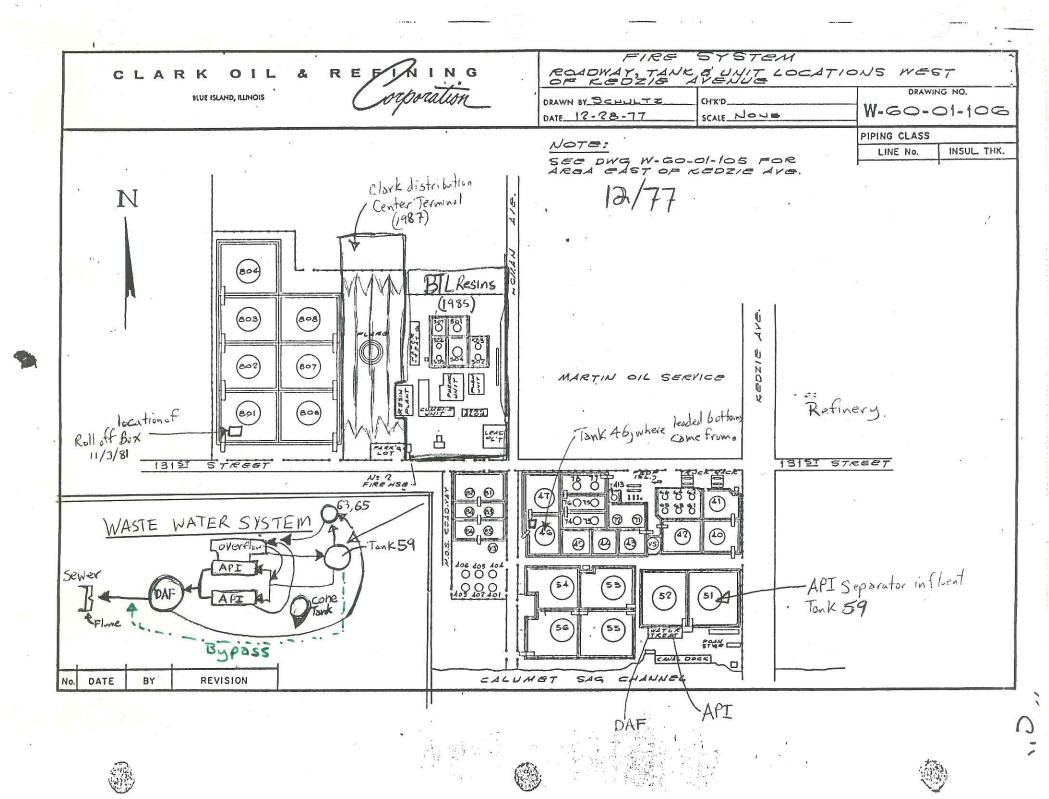
#### **CONCLUSION**

We said that a decision and a letter would be sent to Clark in about 2 months.

Chronology
Clark Oil, Blue Island, ILD 005 109 822

Part A application submittal Generation of waste Sampling and delivery of waste to lab (GCL) Sample tests completed and mailed to Clark Sample tests results received from GCL Sample profile sheet sent to CID landfill Sample analysis completed by CID landfill Application sent to IEPA for permit by landfill Application received by IEPA 90 days after sampling of waste Permit issued by IEPA to CID landfill Copy of permit received by Clark	11/18/80 unknown 7/7/81 7/22/81 7/23/81 7/24/91 8/10/81 8/24/81 8/27/81 10/5/81 10/16/81 10/30/81
Waste taken off site to CID landfill  120 days after sampling of waste Clark request to IEPA & U.S. EPA for withdrawal	11/3/81 11/4/81 <u>8/2/83</u>
Clark letter to IEPA U.S. EPA letter to Clark, certification request	8/23/83 1/27/84
Clark letter to U.S. EPA, requesting withdrawal U.S. EPA (accumulation facility) letter to Clark	7/24/84 12/18/84
Clark letter to U.S. EPA, requesting withdrawal U.S. EPA letter to Clark, certification request Clark letter to U.S. EPA, certification	1/10/85 6/19/85 7/24/85
Clark letter to U.S. EPA (RA), request withdrawal Clark letter to IEPA, enclosing 10/8/85 letter	10/8/85 10/11/85
U.S. EPA, RFA visual site inspection (VSI) Clark letter to U.S. EPA, API bottoms analysis	8/12/87 8/24/87
U.S. EPA, RFA sampling visit (SV) Clark letter to IEPA, generator only status?	12/2/87 12/10/87
Clark letter to IEPA (Maywood) sampling, withdraw IEPA letter to Clark, must submit closure	
Clark letter to IEPA, request variance IEPA letter to Clark, <u>denied variance</u>	3/3/88 3/28/88
Clark letter to IEPA, response, want extension IEPA letter to Clark, not empowered for extension	3/31/88
Clark letter to U.S. EPA, request variance Clark letter to IEPA, withdrawal request followup	7/15/88 8/22/88
U.S. EPA letter to Clark, results of RFA sampling Clark letter to U.S. EPA, variance followup	10/31/88
Clark letter to U.S. EPA, variance followup Clark letter to U.S. EPA, asking for extension U.S. EPA letter to Clark, reviewing request U.S. EPA letter to Clark, denial of extension	4/14/89 9/12/89 11/16/89 1/8/90
Clark letter to U.S. EPA, extension request Clark letter to U.S. EPA, extension followup U.S. EPA site visit & discussion about extension	8/2/90 12/26/90 2/11/91
Clark letter to U.S. EPA, ext. visit followup	2/27/91







#### **ENVIRONMENTAL** MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue Morton Grove, Illinois 60053-3203 708/967-6666 FAX: 708/967-6735

### LABORATORY REPORT

09680-A

Clark Oil Corporation 131st & Kedzie Avenue Blue Island, IL 60406

Report Date: February 4, 1991

Sample Received: As Listed

Sample Description:

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Date	$\mathtt{Time}$	Sample No.	Ammonia	Oil & Grease	
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1/16	8:00 am	2653	6.7	13	
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1/18	8:00 am	2697	11.5	28	
1/18	4:00 pm	2796	11.2	36	
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1/19	Midnight	2788	9.5	17	
1/19	8:00 am	2789	15.4	40	
1/19	4:00 pm	2790	6.4	37	
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1/23	Midnight	2916	7.6	49	
1/23	8:00 am	2912	8.8	30	
1/23	4:00 pm	3025	7.3	13	
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All results expressed as ppm unless otherwise indicated. Analyses performed using "Standard Methods for the Examination of Water and Wastewater", 17th Edition.

LABORATORY DIRECTOR

(3)

# POTENTIAL HAZARDOUS WASTE SITE SITE HISPECTION REPORT DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

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#### POTENTIAL HAZARDOUS WASTE SHE SHEWSPECTION REPORT PART 10 - PAST RESPONSE A CTIVITIES

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#### POTENTIAL HAZARDOUS WASTE SITE SHE INSPECTION REPORT PART 11 - CHEORCEMENT REORGATION

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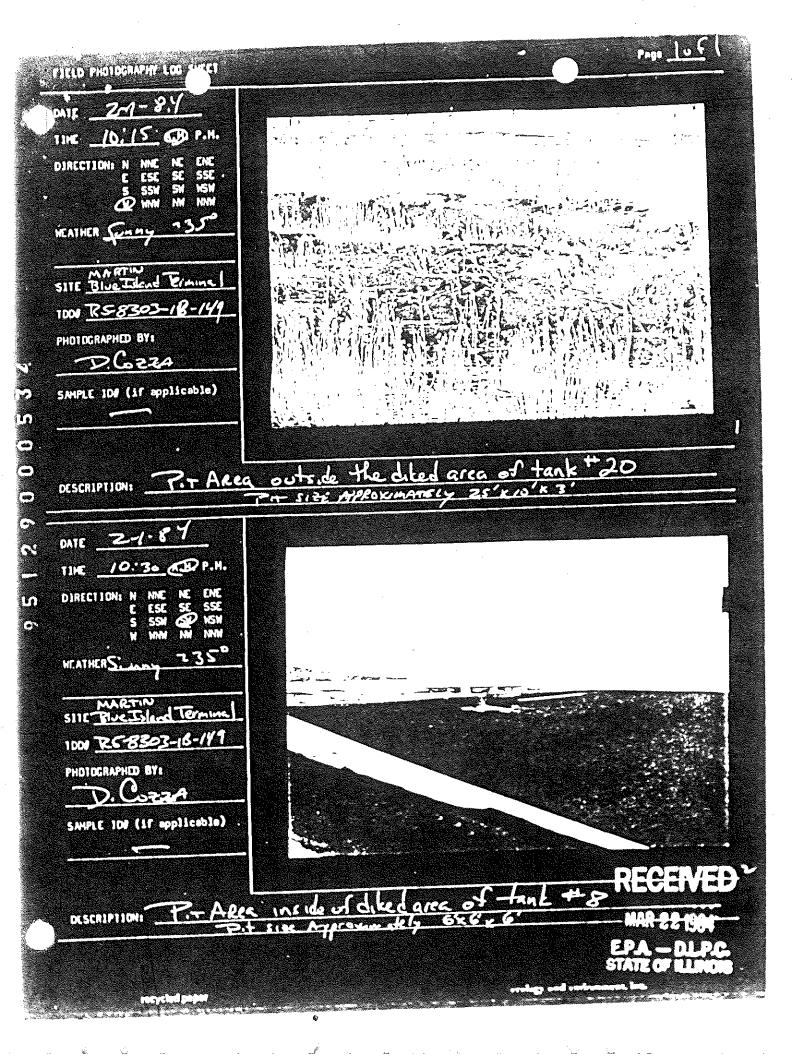
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#### CLARK OIL & RETINING CORPORATION

May 13, 1987



Ms. Shirlee Brauer
U.S. Environmental Protection Agency
Region V
RCRA Enforcement Section 5HE-12
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Ms. Brauer:

In response to the correspondence dated April 17, 1987, received April 21, 1987, enclosed please find the requested certification.

Please contact me if you have any questions or if you require any additional information.

Sincerely,

John T. Bernbom

Director of Environmental Control

dlg

Enclosure

All responses should be sent to Ms. Shirlee Brauer, U.S. EPA Region V, RCRA Enforcement Section, 5HE-12, 230 South Dearborn Street, Chicago, Illinois 60604. Questions may be directed to the RCRA/Superfund Hotline at (800) 424-9346 or to either Ms. Brauer at (312) 886-4591 or Ms. Laura Lodisio at (312) 886-7090.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosure

After reviewing the information provided, I certify that I am not a marketer or burner of waste-as-fuel and that I do not generate hazardous waste used to produce a fuel. Therefore, I am not subject to the regulations finalized on November 29, 1985, which are codified in 40 CFR Part 266, Subparts D and E. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title

Date Signed

fly rentum

Director of Environmental

May 13, 1987

John T. Bernbom

Control

Clark Oil & Refining Corporation remains a generator-only of hazardous waste and is not subject to, or is exempt from, the requirements of 40 CFR Part 266, Subparts D and E at the following locations:

Wood River Refinery P.O. Box 7 Hawthorne Street North Hartford, Illinois 62048

USEPA I.D. No. ILDO41889023

Blue Island Refinery P.O. Box 297 131st & Kedzie Avenue Blue Island, Illinois 60406

USEPA I.D. No. ILDO5109822